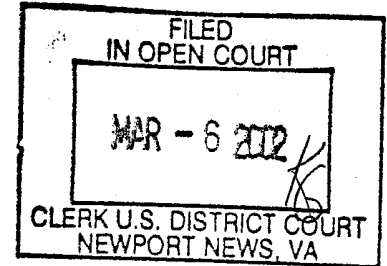


IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
NEWPORT NEWS DIVISION



UNITED STATES OF AMERICA

v.

ANTHONY JOSEPH PACHECO  
a/k/a "Anthony Kearly"  
"John Kearly"  
"Joseph Baca"  
"Joseph Trujilliano"  
(Counts 1, 2, 3, 22, 26, 30, 39, 44,  
49, 53, 54, 57, 63, 66, 67, 79, 80,  
82, 83, 84, 91, 102, 104, 114, 118)

GEORGE FRANKLIN HAUGEN  
(Counts 1, 2, 3, 13, 14, 15, 16, 28  
32, 90, 91, 92, 93, 97, 103, 104,  
106, 113, 114, 116, 117, 118)

MARIO EDWARD ANDRADE,  
a/k/a "Eddie Mario"  
"Juan Andrade"  
(Counts 1, 3, 27, 83)

MANUEL JESUS BELTRAN, JR.  
a/k/a "Louie"  
(Counts 1, 3, 31, 34, 62)

JAMES BRIAN BOLLINGER  
a/k/a "Brian Bollinger"  
(Count 1)

REBECCA BRITO  
a/k/a "Dimples"  
(Count 1)

JAMES HENRY COOK  
(Count 1)

KENNETH DEAN COPELAND  
a/k/a "Kenny Copeland"  
(Counts 1, 3, 10, 11, 12, 87, 89)

TIMOTHY COLE EVANS, SR.  
a/k/a "Timmy Evans"

~~UNDER SEAL~~

Criminal No: 4:02CR 23

21 U.S.C. § 846  
Conspiracy to Distribute  
and Possess with Intent  
to Distribute  
Marihuana and Cocaine  
(Count 1)

21 U.S.C. § 848  
Operating a Continuing  
Criminal Enterprise  
(Count 2)

18 U.S.C. § 1956(h)  
Conspiracy to Launder  
Money  
(Count 3)

18 U.S.C. § 1956(a) (1)  
(A) (I) and (a) (1) (B) (I),  
(a) (2) (B) (I) and 2  
Money Laundering to  
Promote and Disguise  
Drug Trafficking  
(Counts 4-84)

21 U.S.C. § 841(a) (1)  
and (b) (1) (A) (B) (C) (D)  
Distribution of  
Marihuana and Cocaine  
(Counts 86, 88, 91, 93,  
94, 95, 96, 97, 98, 99, 100,  
101, 104, 107, 108, 109, 110,  
112, 115, 116, 117)

21 U.S.C. § 841(a) (1)  
and (b) (1) (A) (B) (C) (D)  
Possession with Intent  
to Distribute Marihuana  
and Cocaine  
(Counts 87, 89, 90, 92, 103  
106, 111, 113, 114, 118)

(Counts 1,3,27,29,30)	)
PETER MARTIN FERNANDEZ	)
(Counts 1,3,59,63,75,84,86,88)	) 21 U.S.C. § 856(a)(1)
PHILIP WILLIAM SHANE FURR	) and (2) and (b)
a/k/a "Shane Furr"	) Maintaining and Managing
(Count 1)	) a Building for
	) Distributing Marihuana
	) and Cocaine
	) (Counts 85,102)
ANDY JULIN GUTIERREZ	)
(Counts 1,3,41,61,69,72,105)	) 18 U.S.C. § 924 (c)(1)
RYAN CHRISTOPHER HANCOCK	) Possession of a Firearm
(Count 1)	) in Furtherance of a Drug
	) Trafficking Crime
	) (Count 105)
DANIEL LINWOOD HARDEN	)
a/k/a "Dan Harden"	) 21 U.S.C. § 853
(Counts 1,3,5,7,87,89)	) 18 U.S.C. § 982
	) Criminal Forfeitures
SHIRLEY FAY HAUGEN	)
(Counts 1,3,44,47,48,85,92,98,	)
109,111)	)
TRACY LYNN HAUGEN	)
a/k/a "Tracy Lynn Hurley"	)
(Counts 1,3,68,80,84,107,108,)	)
WAYNE KENNETH HAUGEN	)
(Counts 1,85,92,109,111)	)
ROBERT LEE HILL	)
a/k/a "Bobby Hill"	)
(Counts 1,3,17,19,20,23,24,28	)
37,38)	)
MACEO JEANPIERRE	)
a/k/a "Mace"	)
(Counts 1,99)	)
JAMES DENVER MORSE, JR.	)
a/k/a "Bubba"	)
(Counts 1,3,62,64,65,66,68,79,	)
106)	)
JEFFREY FOO MOY	)
a/k/a "Jeff Moy"	)
(Count 1)	)
CESAR MUNOZ	)
a/k/a "Frank Castillo"	)
"Cesar Castillo"	)
(Counts 1,3,47,50,52,54,56,60	)
64,81)	)

SHIRLEY GAIL HAUGEN-NEWMAN	)
a/k/a "Shirley Gail Newman"	)
"Shirley Haugen-Bryant"	)
(Counts 1,3,25,39,40,45,46,52,	)
58,59,70,71,72,73,74,75,76,77,	)
78,115)	)
	)
DONNA WASSON PACHECO	)
(Counts 1,3,4,8,9,13,14,17,18,	)
21,25,29,33,37,40,42,43,51,	)
58,70,76,101,110)	)
	)
DAVID CHARLES PATIERNO	)
a/k/a "DCP"	)
(Counts 1,94,95,96,100,112)	)
	)
JOSE RAMIREZ	)
a/k/a "Taz"	)
(Counts 1,3,36,38,55,65)	)
	)
MONICA R. RODRIGUEZ	)
a/k/a "Monica Gonzales"	)
(Count 1)	)
	)
RICHARD RODRIGUEZ	)
a/k/a "Rick Rodriguez"	)
(Count 1)	)
	)
JEREMY JAMES ROYBAL	)
(Counts 1,3,5,6,7)	)
	)
SUZANNE MARIE ROYBAL	)
a/k/a "Suzanne Marie Pacheco"	)
(Counts 3,10,19,20,26,35)	)
	)
BRIAN THOMAS SHERWOOD	)
(Count 1)	)
	)
MELISSA JEAN VICK	)
a/k/a "Melissa Ritthaler"	)
(Counts 1,3)	)
	)
SEAN E. VICK	)
(Counts 1,3,81)	)
	)
Defendants.	)

INDICTMENT

March 2002 Term - at Newport News, Virginia

COUNT 1

THE GRAND JURY CHARGES THAT:

From in or about 1996, the exact date being unknown to the Grand Jury, and continuously thereafter up to and including the filing of this indictment, in the Eastern District of Virginia and elsewhere, ANTHONY JOSEPH PACHECO, a/k/a "Anthony Kearly", a/k/a "John Kearly", a/k/a "Joseph Baca", a/k/a "Joseph Trujilliano" (hereinafter referred to as ANTHONY JOSEPH PACHECO); GEORGE FRANKLIN HAUGEN; MARIO EDWARD ANDRADE, a/k/a "Eddie Mario Juan Andrade" (hereinafter referred to as MARIO EDWARD ANDRADE); MANUEL JESUS BELTRAN, JR., a/k/a "Louie" (hereinafter referred to as MANUEL JESUS BELTRAN, JR.); JAMES BRIAN BOLLINGER, a/k/a "Brian Bollinger" (hereinafter referred to as JAMES BRIAN BOLLINGER); REBECCA BRITO, a/k/a "Dimples" (hereinafter referred to as REBECCA BRITO); JAMES HENRY COOK; KENNETH DEAN COPELAND, a/k/a "Kenny Copeland" (hereinafter referred to as KENNETH DEAN COPELAND); TIMOTHY COLE EVANS, SR., a/k/a "Timmy Evans" (hereinafter referred to as TIMOTHY COLE EVANS, SR.); PETER MARTIN FERNANDEZ; PHILIP WILLIAM SHANE FURR, a/k/a "Shane Furr" (hereinafter referred to as PHILIP WILLIAM SHANE FURR); ANDY JULIN GUTIERREZ; RYAN CHRISTOPHER HANCOCK; DANIEL LINWOOD HARDEN, a/k/a "Dan Harden" (hereinafter referred to as DANIEL LINWOOD HARDEN); SHIRLEY FAY HAUGEN, a/k/a "Shirley Fay Hudgins" (hereinafter referred to as SHIRLEY FAY HAUGEN); TRACY LYNN HAUGEN, a/k/a "Tracy Lynn Hurley" (hereinafter referred to as TRACY LYNN HAUGEN); WAYNE KENNETH HAUGEN; ROBERT LEE HILL, a/k/a "Bobby Hill" (hereinafter referred to as ROBERT LEE HILL); MACEO JEANPIERRE, a/k/a "Mace" (hereinafter referred to as

MACEO JEANPIERRE); JAMES DENVER MORSE, JR., a/k/a "Bubba" (hereinafter referred to as JAMES DENVER MORSE, JR.); JEFFREY FOO MOY, a/k/a "Jeff Moy" (hereinafter referred to as JEFFREY FOO MOY); CESAR MUNOZ, a/k/a "Frank Castillo", a/k/a "Cesar Castillo" (hereinafter referred to as CESAR MUNOZ); SHIRLEY GAIL HAUGEN-NEWMAN, a/k/a "Shirley Gail Newman", a/k/a "Shirley Haugen-Bryant" (hereinafter referred to as SHIRLEY GAIL HAUGEN-NEWMAN); DONNA WASSON PACHECO; DAVID CHARLES PATIERNO, a/k/a "DCP" (hereinafter referred to as DAVID CHARLES PATIERNO); JOSE RAMIREZ, a/k/a "Taz" (hereinafter referred to as JOSE RAMIREZ); MONICA R. RODRIGUEZ, a/k/a "Monica Gonzales" (hereinafter referred to as MONICA R. RODRIGUEZ); RICHARD RODRIGUEZ, a/k/a "Rick Rodriguez" (hereinafter referred to as RICHARD RODRIGUEZ); JEREMY JAMES ROYBAL; BRIAN THOMAS SHERWOOD; MELISSA JEAN VICK, a/k/a "Melissa Ritthaler" (hereinafter referred to as MELISSA JEAN VICK); SEAN E. VICK, the defendants herein, did unlawfully, knowingly and intentionally combine, conspire, confederate, and agree with each other and with other persons, both known and unknown to the Grand Jury, to commit the following offenses against the United States of America:

1. To knowingly, intentionally, and unlawfully distribute one thousand (1000) kilograms or more of a mixture or substance containing a detectable amount of marihuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A)(vii).

2. To knowingly, intentionally, and unlawfully possess with the intent to distribute one thousand (1000) kilograms or more of a mixture or substance containing a detectable amount of marihuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A)(vii).

3. To knowingly, intentionally, and unlawfully distribute five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A)(ii).

4. To knowingly, intentionally, and unlawfully possess with the intent to distribute five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A)(ii).

WAYS, MANNERS AND MEANS OF THE CONSPIRACY

The primary purpose of the conspiracy was to make money through the distribution of marihuana, cocaine, and crystal methamphetamine in the Cities of Hampton, Newport News, and Poquoson and in the counties of Gloucester and York, all in the Commonwealth of Virginia (hereinafter referred to as the "Virginia Peninsula"), within the Eastern District of Virginia; and in Albuquerque, New Mexico; Pittsburgh, Pennsylvania; Chicago, Illinois; Atlanta, Georgia; Harrisonburg, Virginia; Staunton, Virginia; and elsewhere. The ways, manners, and means by which the defendants, co-conspirators, and unindicted co-conspirators, carried out the purpose of the conspiracy include, but are not limited to, the following:

1. It was part of the conspiracy that defendants, co-conspirators, and unindicted co-conspirators would and did play different roles in the conspiracy, take upon themselves different tasks and participate in the affairs of the conspiracy through various criminal acts. The defendants, co-conspirators and unindicted co-conspirators would and did make themselves and their services available at various times throughout the conspiracy and would participate in selected marihuana, cocaine, and crystal methamphetamine distribution ventures on an "as needed" basis. The roles assumed and carried out by the defendants, co-conspirators, and unindicted co-conspirators were interchangeable at various times throughout the conspiracy. These roles include, among others: financier, organizer, manager, supplier, broker, distributor, re-distributor, packager, transporter, courier of

drugs and money, sender and receiver of Western Union wires, sender and receiver of United Parcel Service and Federal Express packages containing United States currency, money launderer, provider of handguns, enforcer, and facilitator.

2. It was further part of the conspiracy that the defendants, co-conspirators, and unindicted co-conspirators would and did procure marihuana, cocaine, and crystal methamphetamine, travel and caused others to travel in interstate and foreign commerce to facilitate the distribution of drugs, the payment and collection of monies related to drug transactions and the laundering of money.

3. It was further part of the conspiracy that the defendants, co-conspirators, and unindicted co-conspirators would and did on a consignment and cash basis obtain, distribute and possess with the intent to distribute in excess of 10,000 pounds of marihuana and in excess of 40 kilograms of cocaine, throughout the course of the conspiracy. On a regular basis, the marihuana and cocaine was provided by suppliers, transported by couriers and delivered to distributors for further re-distribution to other distributors in the Eastern District of Virginia and elsewhere.

4. It was further part of the conspiracy that the defendants, co-conspirators, and unindicted co-conspirators would and did derive substantial gross receipts from their illegal activities to finance the purchase, transportation, and distribution of marihuana, cocaine, and crystal methamphetamine and related expenses as well as their personal living expenses.

5. It was further a part of the said conspiracy that the defendants, co-conspirators, and unindicted co-conspirators would

and did use various methods to further the goals of the conspiracy and insure the conspiracy's continuing success. Some of these methods included the following: a) utilizing numerous co-conspirators to carry out the business of the conspiracy; b) renting and purchasing houses, apartments, townhouses, condominiums, hotel rooms, and vehicles for the use of this illegal drug trafficking organization; c) establishing fictitious businesses; d) using bank accounts, credit card accounts, airlines, telephones, overnight courier services, and wire services; e) retaining legal services to represent co-conspirators who had been stopped transporting marihuana and cocaine from Albuquerque, New Mexico for further redistribution in the Virginia Peninsula and elsewhere; e) and using threats of violence, force and death, abduction, kidnapping, drowning, using and possessing firearms and making threatening telephone calls.

6. It was a further part of the said conspiracy that the defendants, co-conspirators, and unindicted co-conspirators did employ various methods during the transportation and delivery of drugs and drug proceeds to avoid detection by law enforcement agents and further the goals of the conspiracy. These methods included: a) using females and children as passengers in "load" vehicles; b) using license plates and bumper stickers containing pro-family messages; c) traveling in two and three-car caravans using a follow vehicle to act as a decoy to deflect law enforcement attention away from the "load" vehicle should it come under suspicion; d) transporting marihuana and cocaine by varying their routes from Albuquerque, New Mexico to the Virginia Peninsula and

elsewhere; e) using two-way radios and cellular telephones to maintain communication between the vehicles; f) utilizing names of fictitious companies, businesses, and mailing addresses to send and receive numerous packages containing marihuana, cocaine and United States currency; g) packaging marihuana and cocaine in a compressed form, wrapping it in layers of plastic cellophane wrap, tin foil, plastic garbage bags and tape, inserting dryer sheets, carpet deodorizer, alcohol, baby powder, coffee grounds, detergent, and other masking agents to mask the odor from drug sniffing dogs; and h) secreting the marihuana and cocaine in computers, spare tires, hidden compartments in automobiles, and packages wrapped as Christmas gifts.

7. It was further part of the conspiracy that the defendants, co-conspirators, and unindicted co-conspirators would and did utilize various methods to promote the marihuana and cocaine trafficking and conceal and disguise the nature, location, source, ownership, or control of the drug proceeds by remitting money to their suppliers in order to continue to finance and facilitate the on-going illegal trafficking of marihuana and cocaine. These methods included: carrying in excess of \$1,000,000 in United States currency by courier in vehicles and on airplanes; the packaging of in excess of \$1,000,000 in United States currency in at least 100 packages using Etch-A-Sketches, CD-ROM discs, puzzles, and magazines to avoid detection by X-ray scanners and shipping them via Federal Express and United Parcel Service; utilizing Western Union wire transfers to send in excess of \$275,000; and by depositing in excess of \$150,000 into bank accounts and issuing

checks, all of which represented proceeds of marihuana and cocaine trafficking from the Eastern District of Virginia and elsewhere, to be received by other defendants, co-conspirators, and unindicted co-conspirators in Albuquerque, New Mexico and elsewhere.

8. It was further part of the said conspiracy that the defendants, co-conspirators, and unindicted co-conspirators did establish business entities with bank accounts including Array Consultants Ltd., Co., International Hong Kong Tailors, Duran Consulting, and Markal Financial Ltd. Co., which were used to give the appearance that their illegal drug proceeds were legitimate business profits.

9. It was further part of the said conspiracy that the defendants, co-conspirators, and unindicted co-conspirators would and did utilize various "stash" locations to receive, store, wrap, package, and distribute marihuana, cocaine, and drug proceeds and conduct the illegal affairs of the conspiracy, including:

- a. 10 Wagner Road, Poquoson, Virginia;
- b. 1815 Gildner Road, Hampton, Virginia;
- c. 223 Belray Drive, Newport News, Virginia;
- d. 227 Bruton Avenue, Newport News, Virginia;
- e. 1061 Palmerton Drive, Newport News, Virginia;
- f. 1115 Palmerton Drive, Newport News, Virginia;
- g. 109 Troy Drive, Newport News, Virginia;
- h. 7647 Paynes Landing Road, Gloucester County, Virginia;
- i. 201 W. Lakeside Drive, Nags Head, North Carolina;
- j. 410 Briar Hill Road, Suite 105, Norfolk, Virginia;
- k. 1283 Jerusalem Chapel Road, Churchville, Virginia;

- l. 41 Garbers Church Road, Harrisonburg, Virginia;
- m. 118 Lambert Street, Staunton, Virginia;
- n. 4704 Apollo Court NW, Albuquerque, New Mexico;
- o. 4916 Duffer Place NW, Albuquerque, New Mexico;
- p. 650 Western Hills, Rio Rancho, New Mexico;
- q. 6308 Trujillo Road SW, Albuquerque, New Mexico;
- r. 305 Cagua Drive NE, Albuquerque, New Mexico;
- s. 3342 Princeton Drive NE, Albuquerque, New Mexico;
- t. 5213 Calle Nuestra NW, Albuquerque, New Mexico;
- u. 616 Tanager Drive SW, Albuquerque, New Mexico;
- v. 5512 Overlook Drive NE, Albuquerque, New Mexico;
- w. 5516 Overlook Drive NE, Albuquerque, New Mexico;
- x. 1401 4<sup>th</sup> Street NW, Albuquerque, New Mexico;
- y. 640 Middle Avenue, Apartment A, Wilmerding, Pennsylvania;
- z. 815 Hinnerman Street, Duquesne, Pennsylvania; and

other residences and business establishments, within the Eastern District of Virginia and elsewhere.

10. It was further part of the said conspiracy that the defendants, co-conspirators, and unindicted co-conspirators would recruit individuals from the Virginia Peninsula; Albuquerque, New Mexico; Pittsburgh, Pennsylvania; and elsewhere to be employed as drug and money couriers; drug distributors; senders and receivers of Federal Express and United Parcel Service packages containing marihuana, cocaine, and United States currency; money launderers; senders and receivers of Western Union wire transfers; facilitators; and lessees of rental vehicles and hotel rooms in the Eastern District of Virginia and elsewhere.

11. It was further part of the conspiracy that the defendants, co-conspirators and unindicted co-conspirators would and did use electronic pagers, long distance calling cards, landline telephones, cellular/PCS telephones, pre-paid cellular telephones, facsimile machines, and electronic mail to facilitate and further their marihuana and cocaine trafficking and money laundering activities. Such usage included telephoning each other regarding the delivery of marihuana and cocaine and utilizing the Federal Express automated tracking system to obtain the delivery status of packages containing marihuana, cocaine, and United States currency. Some of these devices were obtained in nominee names and under aliases.

12. It was a further part of the said conspiracy that the defendants, co-conspirators and unindicted co-conspirators did communicate with each other the various names to be used to send and receive parcels containing controlled substances and United States currency and for sending and receiving Western Union wire transfers.

13. It was further part of the conspiracy that, on a regular basis, the defendants, co-conspirators, and unindicted coconspirators would and did utilize Federal Express and United Parcel Service to send packages containing quantities of marihuana and cocaine from Albuquerque, New Mexico to the Virginia Peninsula and elsewhere for distribution of these controlled substances in the Eastern District of Virginia and elsewhere.

14. It was further part of the said conspiracy that the defendants, co-conspirators, and unindicted co-conspirators did use fictitious names and addresses of business entities on Federal Express air bill labels to disguise their illegal activities and avoid

detection from law enforcement by giving the appearance that these packages containing drug proceeds were legitimate. These fictitious business entities included: True Bait Ltd., Sean Bait Shop Ltd., Trujilliano Consulting Ltd., Kitchen Accounts, Auto Auction Inc., Greater Pitt Auto Auction, and Made in the Shade.

15. It was further part of the said conspiracy, that after some of the co-conspirators were stopped by law enforcement agents in connection with their illegal activities relating to this conspiracy, other defendants, co-conspirators, and unindicted co-conspirators would and did change their method of operation to continue their controlled substances distribution activities and avoid detection by law enforcement agents. These changes in method of operation included changing telephone numbers, couriers, drug and money courier routes, types of vehicles, and employed multi-vehicle caravans with more than one load vehicle to reduce the risk of seizure of the entire shipment.

#### OVERT ACTS

In furtherance of the conspiracy, and to bring about the objects and goals of the conspiracy, the defendants, co-conspirators, and unindicted co-conspirators committed overt acts in the Eastern District of Virginia and elsewhere, including, but not limited to, the overt acts listed in Count Three of this Indictment, which are incorporated by reference herein, and the following:

1. In or about the Spring of 1996, in Albuquerque, New Mexico, CESAR MUNOZ distributed approximately 50 pounds of marihuana to a co-conspirator at a cost of approximately \$375.

2. In or about April 1996, within the Virginia Peninsula, DAVID CHARLES PATIERNO sent four (4) wire transfers totaling \$3800, which represented proceeds from marihuana and cocaine trafficking, to KENNETH DEAN COPELAND, who received them in Atlantic City, New Jersey.

3. On or about September 1, 1996, in Newport News, Virginia, DAVID CHARLES PATIERNO sent a wire transfer for \$500, which represented proceeds from marihuana and cocaine trafficking, to KENNETH DEAN COPELAND, who received it in Atlantic City, New Jersey.

4. On or about October 5, 1996, in Hayes, Virginia, KENNETH DEAN COPELAND sent a wire transfer for \$1000, which represented proceeds from marihuana and cocaine trafficking, to DAVID CHARLES PATIERNO, who received it in Atlantic City, New Jersey.

5. In or about the Winter of 1996, in Albuquerque, New Mexico, ANTHONY JOSEPH PACHECO supplied marihuana to GEORGE FRANKLIN HAUGEN for further redistribution within the Virginia Peninsula.

6. In or about the Winter of 1996, GEORGE FRANKLIN HAUGEN and a co-conspirator transported marihuana in a vehicle from Albuquerque, New Mexico to Newport News, Virginia for further redistribution.

7. In or about the Winter of 1996, in Newport News, Virginia, KENNETH DEAN COPELAND distributed to a co-conspirator approximately 25 pounds of marihuana at approximately \$900 per pound in the presence of ANTHONY JOSEPH PACHECO, GEORGE FRANKLIN HAUGEN, and another unindicted co-conspirator.

8. In or about Winter 1997, DANIEL LINWOOD HARDEN distributed a quantity of marihuana to an unindicted co-conspirator, who maintained an address/telephone book with the names and telephone

numbers of DANIEL LINWOOD HARDEN, KENNETH DEAN COPELAND, and GEORGE FRANKLIN HAUGEN.

9. On or about January 26, 1997, in Newport News, Virginia, DANIEL LINWOOD HARDEN received a 1967 Volkswagen (VIN: 117086180) including the title from an unindicted co-conspirator as partial payment for a marihuana debt.

10. In or about February 1997, in Hampton, Virginia, KENNETH DEAN COPELAND distributed approximately five (5) pounds of marihuana to a co-conspirator.

11. In or about the Spring of 1997, in Hampton, Virginia, GEORGE FRANKLIN HAUGEN distributed approximately four (4) ounces of cocaine for \$3,400 to a co-conspirator in the parking lot of Mattress Discounters.

12. On or about April 21, 1997, PETER MARTIN FERNANDEZ transported marihuana in a vehicle from Albuquerque, New Mexico to the Virginia Peninsula for further redistribution.

13. On or about April 23, 1997, in Gloucester County, Virginia, PETER MARTIN FERNANDEZ supplied marihuana to DANIEL LINWOOD HARDEN and KENNETH DEAN COPELAND, both of whom stored it in a storage shed located at 7647 Paynes Landing Road.

14. On or about April 24, 1997, in Newport News, Virginia, at 1115 Palmerton Drive, DANIEL LINWOOD HARDEN, KENNETH DEAN COPELAND, and an unindicted co-conspirator counted approximately \$17,000 in United States currency, which represented proceeds of marihuana and cocaine trafficking.

15. On or about May 10, 1997, DANIEL LINWOOD HARDEN moved to 201

W. Lakeside Drive, Nags Head, North Carolina, and continued to operate his marihuana business.

16. On or about May 26, 1997, in Nags Head, North Carolina, ANTHONY JOSEPH PACHECO made repeated threatening telephone calls to DANIEL LINWOOD HARDEN demanding payment for a marihuana debt.

17. In or about June 1997, in Albuquerque, New Mexico, CESAR MUNOZ distributed approximately 100 pounds of marihuana to a co-conspirator.

18. On or about June 23, 1997, at the Comfort Inn, in Hampton, Virginia, DANIEL LINWOOD HARDEN, KENNETH DEAN COPELAND and GEORGE FRANKLIN HAUGEN packaged approximately \$55,000 in United States currency, which represented proceeds of marihuana and cocaine trafficking, in a nylon bag along with Etch-A-Sketches to avoid detection in X-ray scanners at the airports by law enforcement.

19. On or about June 24, 1997, DANIEL LINWOOD HARDEN and an unindicted co-conspirator traveled by airplane from Norfolk, Virginia to Albuquerque, New Mexico, transporting approximately \$55,000 in United States currency.

20. On or about June 24, 1997, in Albuquerque, New Mexico, DANIEL LINWOOD HARDEN delivered approximately \$55,000 in United States currency to ANTHONY JOSEPH PACHECO, which represented proceeds of marihuana and cocaine trafficking.

21. On or about June 25, 1997, ANTHONY JOSEPH PACHECO, DANIEL LINWOOD HARDEN and an unindicted co-conspirator transported approximately 100 pounds of marihuana in a rental vehicle from Albuquerque, New Mexico to St. Louis, Missouri.

22. On or about June 25, 1997, PETER MARTIN FERNANDEZ and an unindicted co-conspirator traveled in a rental vehicle from the Virginia Peninsula to St. Louis, Missouri.

23. On or about June 25, 1997, in St. Louis, Missouri, PETER MARTIN FERNANDEZ rented room #1045 at the Regal Riverfront Hotel.

24. On or about June 26, 1997, in St. Louis, Missouri, ANTHONY JOSEPH PACHECO and DANIEL LINWOOD HARDEN delivered approximately 100 pounds of marihuana to PETER MARTIN FERNANDEZ.

25. On or about June 26, 1997, DANIEL LINWOOD HARDEN and an unindicted co-conspirator flew Delta Airlines from St. Louis, Missouri to Norfolk, Virginia to oversee the distribution of marihuana and cocaine and the collection of drug proceeds.

26. On or about June 26, 1997, PETER MARTIN FERNANDEZ and an unindicted co-conspirator transported approximately 100 pounds of marihuana in a rental vehicle from St. Louis, Missouri to Gloucester County, Virginia, for further redistribution within the Virginia Peninsula.

27. In or about the Summer of 1997, at 201 W. Lakeside Drive, in Nags Head, North Carolina, KENNETH DEAN COPELAND placed approximately \$30,000 of United States currency, which represented proceeds of marihuana and cocaine trafficking belonging to DANIEL LINWOOD HARDEN and KENNETH DEAN COPELAND, into an unindicted co-conspirator's suitcase for further delivery to ANTHONY JOSEPH PACHECO and PETER MARTIN FERNANDEZ, who had supplied the marihuana and cocaine.

28. In or about the Summer of 1997, an unindicted co-conspirator traveled by airplane from Nags Head, North Carolina to Norfolk,

Virginia and on to Albuquerque, New Mexico, where the suitcase containing \$30,000 was delivered to ANTHONY JOSEPH PACHECO and PETER MARTIN FERNANDEZ.

29. In or about the Summer of 1997, in Hampton, Virginia, GEORGE FRANKLIN HAUGEN distributed approximately four (4) ounces of marihuana in exchange for crack cocaine with a co-conspirator.

30. In or about the Summer of 1997, in Hampton, Virginia, GEORGE FRANKLIN HAUGEN possessed with intent to distribute, approximately 15 pounds of marihuana concealed in a garment bag in the trunk of a burgundy Chevrolet Lumina.

31. In or about the Summer of 1997, in Hampton, Virginia, GEORGE FRANKLIN HAUGEN distributed approximately three (3) pounds of marihuana to a co-conspirator.

32. In or about the Summer of 1997, within the Virginia Peninsula, GEORGE FRANKLIN HAUGEN distributed approximately three (3) pounds of marihuana on three (3) occasions to co-conspirator in exchange for a total payment of \$6,000.

33. In or about the Summer of 1997, at the Arrow Inn, in Hampton, Virginia, GEORGE FRANKLIN HAUGEN distributed a quantity of cocaine to RYAN CHRISTOPHER HANCOCK.

34. In or about August 1997, in Hampton, Virginia, ANTHONY JOSEPH PACHECO and GEORGE FRANKLIN HAUGEN supplied approximately two (2) kilograms of cocaine for \$56,000 to a co-conspirator for further redistribution.

35. In or about September 1997, in Newport News, Virginia, DAVID CHARLES PATIERNO sent two (2) wire transfers totaling \$550, which

represented proceeds from marihuana and cocaine trafficking, to KENNETH DEAN COPELAND, who received them in Atlantic City, New Jersey.

36. In or about September 1997, within the Virginia Peninsula, GEORGE FRANKLIN HAUGEN distributed approximately eight (8) ounces of marihuana to a co-conspirator.

37. On or about September 18, 1997, in Colby, Kansas, GEORGE FRANKLIN HAUGEN possessed approximately 135 pounds of marihuana disguised as gift wrapped packages, in a vehicle which he was transporting to the Virginia Peninsula for further redistribution to others.

38. In or about late September or early October 1997, within the Virginia Peninsula, an unindicted co-conspirator maintained an address/telephone book containing names, addresses or telephone numbers of KENNETH DEAN COPELAND, PETER MARTIN FERNANDEZ, GEORGE FRANKLIN HAUGEN, ANTHONY JOSEPH PACHECO, DAVID CHARLES PATIERNO, and other co-conspirators.

39. In or about the Fall of 1997, at 10 Wagner Road, in Poquoson, Virginia, GEORGE FRANKLIN HAUGEN, SHIRLEY FAY HAUGEN and WAYNE KENNETH HAUGEN possessed with intent to distribute approximately four (4) kilograms of cocaine.

40. In or about the Fall of 1997, WAYNE KENNETH HAUGEN drove GEORGE FRANKLIN HAUGEN from Poquoson, Virginia to Newport News, Virginia in a green Toyota pick-up truck containing approximately one (1) kilogram of cocaine and distributed as a sample, approximately an eighth (1/8<sup>th</sup>) ounce of cocaine to a co-conspirator.

41. In or about the Fall of 1997, in York County, Virginia, in

the parking lot of Food Lion on Magruder Boulevard, GEORGE FRANKLIN HAUGEN distributed approximately seven (7) ounces of cocaine to a co-conspirator in exchange for approximately \$875 per ounce.

42. In or about the Fall of 1997, within the Virginia Peninsula, TIMOTHY COLE EVANS, JR. transported GEORGE FRANKLIN HAUGEN to collect United States currency from drug customers, which represented proceeds from marihuana and cocaine trafficking.

43. In or about November 1997, at the Hardee's at Kiln Creek, in York County, Virginia, GEORGE FRANKLIN HAUGEN distributed approximately eight (8) pounds of marihuana to an unindicted co-conspirator.

44. In or about November 1997, in York County, Virginia, WAYNE KENNETH HAUGEN met an unindicted co-conspirator at the Hardee's at Kiln Creek to collect United States currency, which represented proceeds from marihuana and cocaine trafficking.

45. On or about November 26, 1997, ANTHONY JOSEPH PACHECO flew on Delta Airlines from Albuquerque, New Mexico to Norfolk, Virginia to oversee the distribution of marihuana and cocaine and the collection of drug proceeds.

46. On or about December 2, 1997, ANTHONY JOSEPH PACHECO flew on Delta Airlines from Norfolk, Virginia to Albuquerque, New Mexico.

47. On or about December 6, 1997, in Albuquerque, New Mexico, ANTHONY JOSEPH PACHECO leased a vehicle from National Car Rental.

48. On or about December 20, 1997, in St. Louis County, Missouri, WAYNE KENNETH HAUGEN possessed approximately 87 pounds of marihuana, in a rental vehicle which he was transporting to the

Virginia Peninsula for further redistribution to others.

49. On or about December 22, 1997, in Poquoson, Virginia, GEORGE FRANKLIN HAUGEN sent a \$1500 Western Union wire transfer to St. Louis, Missouri, as a partial payment for the legal representation of WAYNE KENNETH HAUGEN.

50. On or about December 27, 1997, ANTHONY JOSEPH PACHECO flew on Delta Airlines from Albuquerque, New Mexico to Norfolk, Virginia to oversee the distribution of marihuana and cocaine and the collection of drug proceeds.

51. On or about January 5, 1998, ANTHONY JOSEPH PACHECO flew on Delta Airlines from Norfolk, Virginia to Albuquerque, New Mexico.

52. In or about the Winter of 1998, at 10 Wagner Road, in Poquoson, Virginia, DONNA WASSON PACHECO delivered a quantity of marihuana to GEORGE FRANKLIN HAUGEN.

53. On or about February 16, 1998, in Harrisonburg, Virginia, GEORGE FRANKLIN HAUGEN and JAMES DENVER MORSE, JR. collected approximately \$5000 from JEFFREY FOO MOY, which represented proceeds from the sale of marihuana and cocaine, which GEORGE FRANKLIN HAUGEN had distributed to MOY for further redistribution to others.

54. On or about February 20, 1998, ROBERT LEE HILL traveled from the Virginia Peninsula to Albuquerque, New Mexico to return with a quantity of marihuana.

55. On or about February 24, 1998, JEFFREY FOO MOY purchased First Virginia Bank cashier's check #517689 for \$1000, which represented proceeds from marihuana and cocaine trafficking.

56. On or about February 25, 1998, in Albuquerque, New Mexico,

ANTHONY JOSEPH PACHECO endorsed and negotiated First Virginia Bank cashier's check #517689, received from JEFFREY FOO MOY, by depositing \$200 into his checking account and receiving the balance of \$800 in United States currency, which represented proceeds from marihuana and cocaine trafficking.

57. On or about March 2, 1998, ROBERT LEE HILL traveled from the Virginia Peninsula to Albuquerque, New Mexico to return with a quantity of marihuana.

58. On or about March 10, 1998, in Newport News, Virginia, WAYNE KENNETH HAUGEN leased a 1998 Ford Taurus, bearing Virginia license plates ZEA-5873 from Budget Rent-A-Car.

59. On or about March 16, 1998, in Harrisonburg, Virginia, JEFFREY FOO MOY delivered United States currency to a co-conspirator, which represented proceeds from the sale of marihuana and cocaine, which GEORGE FRANKLIN HAUGEN had distributed to MOY for further redistribution to others.

60. On or about March 23, 1998, in Harrisonburg, Virginia, JEFFREY FOO MOY delivered United States currency to a co-conspirator, which represented proceeds from the sale of marihuana and cocaine, which GEORGE FRANKLIN HAUGEN had distributed to MOY for further redistribution to others.

61. On or about March 28, 1998, in Harrisonburg, Virginia, JEFFREY FOO MOY delivered United States currency to a co-conspirator, which represented proceeds from the sale of marihuana and cocaine, which GEORGE FRANKLIN HAUGEN had distributed to MOY for further redistribution to others.

62. On or about April 1, 1998, in Harrisonburg, Virginia, WAYNE KENNETH HAUGEN collected United States currency from JEFFREY FOO MOY, which represented proceeds from the sale of marihuana and cocaine, which GEORGE FRANKLIN HAUGEN had distributed to MOY for further redistribution to others.

63. On or about April 3, 1998, in Albuquerque, New Mexico, ANTHONY JOSEPH PACHECO caused an unindicted co-conspirator to lease a maroon 1997 Chevrolet Lumina for ROBERT LEE HILL and MELISSA JEAN VICK to utilize in transporting 109 pounds of marihuana to the Virginia Peninsula.

64. In or about April 3, 1998, in Albuquerque, New Mexico, ROBERT LEE HILL and MELISSA JEAN VICK concealed approximately 109 pounds of marihuana inside copy paper boxes in the trunk of a maroon 1997 Chevrolet Lumina rental vehicle.

65. On or about April 4, 1998, in Norfolk, Virginia, WAYNE KENNETH HAUGEN leased a 1997 Mercury Sable, bearing Virginia license plates ZCW-7787 from Budget Rent-A-Car for GEORGE FRANKLIN HAUGEN to transport marihuana and cocaine and collect drug proceeds.

66. On or about April 5, 1998, in Lancaster County, Nebraska, ROBERT LEE HILL and MELISSA JEAN VICK possessed approximately 109 pounds of marihuana, which they were transporting in a maroon 1997 Chevrolet Lumina rental vehicle to the Virginia Peninsula for further redistribution to others.

67. On or about April 6, 1998, ANTHONY JOSEPH PACHECO telephoned REBECCA BRITO after the stop of ROBERT LEE HILL and the seizure of approximately 109 pounds of marihuana in the maroon 1997 Chevrolet

Lumina rental vehicle.

68. On or about April 7, 1998, ANTHONY JOSEPH PACHECO flew from Albuquerque, New Mexico to Baltimore-Washington International Airport.

69. On or about April 7, 1998, GEORGE FRANKLIN HAUGEN traveled in a vehicle from the Virginia Peninsula to Baltimore, Maryland to pickup ANTHONY JOSEPH PACHECO and transported him to the Virginia Peninsula to oversee the distribution of marihuana and cocaine and the collection of drug proceeds.

70. On or about April 8, 1998, in Harrisonburg, Virginia, GEORGE FRANKLIN HAUGEN collected United States currency from JEFFREY FOO MOY, which represented proceeds from the sale of marihuana and cocaine, which GEORGE FRANKLIN HAUGEN had distributed to MOY for further redistribution to others.

71. On or about April 14, 1998, in Baltimore, Maryland, ANTHONY JOSEPH PACHECO rented hotel room #405 at the Harbor Court Hotel.

72. On or about April 14, 1998, GEORGE FRANKLIN HAUGEN traveled in a vehicle from the Virginia Peninsula to Baltimore, Maryland to meet with ANTHONY JOSEPH PACHECO.

73. In or about the Spring of 1998, in Albuquerque, New Mexico, CESAR MUNOZ distributed approximately one (1) pound of crystal methamphetamine to a co-conspirator.

74. In or about the Spring of 1998, in the parking lot of the West Gate Pub, in Hampton, Virginia, GEORGE FRANKLIN HAUGEN and an unindicted co-conspirator distributed 18 ounces of cocaine to a co-conspirator in exchange for \$13,500.

75. In or about the Spring of 1998, in York County, Virginia,

GEORGE FRANKLIN HAUGEN purchased Etch-A-Sketches which he and co-conspirators utilized to insert in the money packages being shipped via Federal Express to Albuquerque, New Mexico, to conceal the United States currency from detection by law enforcement agents.

76. In or about the Spring of 1998, within the Virginia Peninsula, TIMOTHY COLE EVANS, JR. transported GEORGE FRANKLIN HAUGEN to collect United States currency, which represented proceeds of marihuana and cocaine trafficking.

77. In or about the Spring of 1998, within the Virginia Peninsula, SHIRLEY GAIL HAUGEN-NEWMAN transported GEORGE FRANKLIN HAUGEN to distribute marihuana and collect United States currency from drug customers, which represented proceeds from marihuana and cocaine trafficking.

78. On or about April 16, 1998, in Harrisonburg, Virginia, GEORGE FRANKLIN HAUGEN and TRACY LYNN HAUGEN collected United States currency from JEFFREY FOO MOY, which represented proceeds from the sale of marihuana and cocaine, which GEORGE FRANKLIN HAUGEN had distributed to MOY for further redistribution to others.

79. On or about April 30, 1998, in Harrisonburg, Virginia, GEORGE FRANKLIN HAUGEN collected United States currency from JEFFREY FOO MOY, which represented proceeds from the sale of marihuana and cocaine, which GEORGE FRANKLIN HAUGEN had distributed to MOY for further redistribution to others.

80. On or about May 26, 1998, ANTHONY JOSEPH PACHECO flew from Albuquerque, New Mexico to Baltimore-Washington International Airport and then traveled to the Virginia Peninsula to oversee the

distribution of marihuana and cocaine and the collection of drug proceeds.

81. On or about May 31, 1998, in Newport News, Virginia, WAYNE KENNETH HAUGEN leased a 1998 Ford Contour, bearing Virginia plates ZBY-9521 from Budget Rent-A-Car.

82. On or about June 2, 1998, ANTHONY JOSEPH PACHECO flew from Baltimore-Washington International Airport to Albuquerque, New Mexico to make arrangements for the re-supply of marihuana and cocaine.

83. On or about June 4, 1998, in Newport News, Virginia, WAYNE KENNETH HAUGEN leased a 1998 Ford Windstar, bearing Virginia license plates ZBL-3706 from Budget Rent-A-Car.

84. On or about June 9, 1998, in Harrisonburg, Virginia, WAYNE KENNETH HAUGEN collected United States currency from JEFFREY FOO MOY, which represented proceeds from the sale of marihuana and cocaine, which GEORGE FRANKLIN HAUGEN had distributed to MOY for further redistribution to others.

85. On or about June 11, 1998, ANTHONY JOSEPH PACHECO flew Continental Airlines from Albuquerque, New Mexico to Baltimore-Washington International Airport.

86. On or about June 11, 1998, ANTHONY JOSEPH PACHECO traveled from Baltimore, Maryland to the Virginia Peninsula to oversee the distribution of marihuana and cocaine and the collection of drug proceeds.

87. On or about June 11, 1998, in Newport News, Virginia, SHIRLEY FAY HAUGEN leased a vehicle from Budget Rent-A-Car for ANTHONY JOSEPH PACHECO while he stayed in the Virginia Peninsula.

88. On or about June 12, 1998, in Wyoming, MELISSA JEAN VICK, a/k/a MELISSA RITTHALER titled a 1992 Chevrolet Truck (VIN: 1GNDT13Z8N2167850), which was purchased from an unindicted co-conspirator.

89. On or about June 18, 1998, in Newport News, Virginia, DANIEL LINWOOD HARDEN distributed approximately 3.54 ounces of marihuana in exchange for \$300 to a confidential informant, who was under the control of law enforcement.

90. On or about June 20, 1998, ANTHONY JOSEPH PACHECO flew on Continental Airlines from Baltimore-Washington International Airport to Albuquerque, New Mexico to make arrangements for the re-supply of marihuana and cocaine.

91. On or about June 22, 1998, in Harrisonburg, Virginia, WAYNE KENNETH HAUGEN collected United States currency from JEFFREY FOO MOY, which represented proceeds from the sale of marihuana and cocaine, which GEORGE FRANKLIN HAUGEN had distributed to MOY for further redistribution to others.

92. In or about the Summer of 1998, in Poquoson, Virginia, ANTHONY JOSEPH PACHECO, GEORGE FRANKLIN HAUGEN, and four (4) unindicted co-conspirators discussed using the house located at 994 Poquoson Avenue as an alternative location to 10 Wagner Road to unload quantities of marihuana to further conceal their illegal activities.

93. In or about the Summer of 1998, in Albuquerque, New Mexico, CESAR MUNOZ distributed approximately three (3) pounds of crystal methamphetamine to a co-conspirator.

94. On or about August 16, 1998, a co-conspirator transported a

quantity of marihuana in a vehicle from Albuquerque, New Mexico to Baltimore, Maryland for further redistribution on the Virginia Peninsula.

95. On or about August 18, 1998, ANTHONY JOSEPH PACHECO flew on Continental Airlines from Albuquerque, New Mexico to Baltimore-Washington International Airport.

96. On or about August 19, 1998, ANTHONY JOSEPH PACHECO traveled from Baltimore, Maryland to the Virginia Peninsula to oversee the distribution of marihuana and cocaine and the collection of drug proceeds.

97. On or about August 19, 1998, within the Virginia Peninsula, GEORGE FRANKLIN HAUGEN distributed a quantity of marihuana to JAMES BRIAN BOLLINGER for further redistribution.

98. On or about August 22, 1998, in Harrisonburg, Virginia, GEORGE FRANKLIN HAUGEN collected United States currency from JEFFREY FOO MOY, which represented proceeds from the sale of marihuana and cocaine, which GEORGE FRANKLIN HAUGEN had distributed to MOY for further redistribution to others.

99. On or about August 25, 1998, ANTHONY JOSEPH PACHECO flew on Continental Airlines from Baltimore-Washington International Airport to Albuquerque, New Mexico to make arrangements for the re-supply of marihuana and cocaine.

100. On or about August 29, 1998, in Harrisonburg, Virginia, JEFFREY FOO MOY sent an \$1880 wire transfer to ANTHONY JOSEPH PACHECO in Albuquerque, New Mexico.

101. On or about August 29, 1998, MELISSA JEAN VICK transported